

KAEMPFER CROWELL
Robert McCoy, No. 9121
Sihomara L. Graves, No. 13239
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Telephone: (702) 792-7000
Facsimile: (702) 796-7181
Email: rmccoy@kcnvlaw.com
Email: sgraves@kcnvlaw.com

Attorneys for Defendant American Express
Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAUL INGRAHAM,

Plaintiff,

vs.

AMERICAN EXPRESS COMPANY,

Defendants.

Case No. 2:21-cv-01277-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
(SECOND REQUEST)**

Plaintiff Paul Ingraham (“Ingraham”) and defendant American Express Company (“Amex”) stipulate that the deadline for Amex to respond to the complaint (ECF No. 1) be extended from September 13, 2021 until October 14, 2021. The parties previously stipulated to extend the deadline for Amex to respond to the complaint on August 12, 2021 (ECF No. 5).

Since that time, the parties have engaged in good faith efforts to resolve this matter without the need for further litigation. These discussions are ongoing.

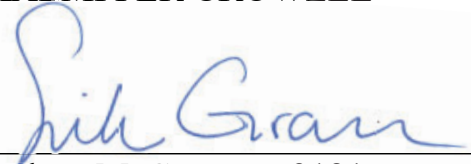
Thus, this extension is requested to permit the parties to discuss the possibility of settlement without incurring additional litigation expenses.

FREEDOM LAW FIRM

KAEMPFER CROWELL

/s/ Gerardo Avalos

George Haines, No. 9411
Gerardo Avalos, No. 15171
8985 S. Eastern Ave., Suite 350
Las Vegas, Nevada 89123


Robert McCoy, No. 9121
Sihomara L. Graves, No. 13239
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135

KIND LAW
Michael Kind, No. 13903
8860 South Maryland Parkway
Suite 106
Las Vegas, Nevada 89123

Attorneys for Defendant American
Express Company

Attorney for Plaintiff Paul Ingraham

Order

IT IS SO ORDERED

DATED: 10:13 am, September 10, 2021


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE